

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:
ALL CASES

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF KARL STAMPFL IN SUPPORT OF
ALLERGAN DEFENDANTS' OPPOSITION TO PLAINTIFFS'
MOTION FOR SANCTIONS**

1. I, Karl Stampfl, am a Partner at Kirkland & Ellis LLP, which represents the Allergan Defendants in the *National Prescription Opiate Litigation*, MDL 2804. I submit this Declaration in support of the Allergan Defendants' Opposition to Plaintiffs' Motion for Sanctions.

2. Attached hereto are true and correct copies of the following exhibits:

- Exhibit 1: Service Provider Master Agreement, TEVA_MDL_A_13647407
- Exhibit 2: Statement of Work No. 1, ALLERGAN_MDL_02467194
- Exhibit 3: Excerpts from January 17, 2019 Deposition of Thomas P. Napoli
- Exhibit 4: February 5, 2019 Letter from Catie Ventura
- Exhibit 5: June 14, 2019 Letter from Donna M. Welch
- Exhibit 6: July-August 2020 Email Exchange
- Exhibit 7: September 8, 2011 SOMS (Suspicious Order Management) Presentation, ALLERGAN_MDL_03826436
- Exhibit 8: Suspicious Order Monitoring (SOM) Presentation, ALLERGAN_MDL_03824296
- Exhibit 9: February 15, 2019 Letter from Patrick L. Oot
- Exhibit 10: May 29, 2019 Letter from Catie Ventura
- Exhibit 11: June 13, 2019 Letter from Catie Ventura
- Exhibit 12: September 3, 2020 Email from Catie Ventura

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 14, 2020 in Chicago, Illinois.

/s/ Karl Stampfl
Karl Stampfl

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2020, a copy of the foregoing **Declaration of Karl Stampfl in Support of Allergan Defendants' Opposition to Plaintiffs' Motion for Sanctions** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/ Donna M. Welch
Donna M. Welch